

### **REMARKS**

By way of the present response, claims 1-6, 23, 24, 35, and 36 have been amended to further define the claimed invention. Accordingly, claims 1-100 are currently pending. In view of the remarks advanced below, Applicant respectfully requests reconsideration and withdrawal of the rejection of claims.

Applicant respectfully asserts that support for the amendments to independent claims 1 and 2 may be found at least at paragraphs [0062]-[0064] and FIG. 4B. In addition, Applicant respectfully asserts that support for the amendments to independent claims 3-6 may be found at least at paragraphs [0057]-[0059] and FIGs. 3A and 3B. Accordingly, Applicant respectfully asserts that no new matter is introduced by the present Amendment.

On pages 2 to 3 of the Final Office Action, claims 1-100 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Kurimoto (US 5,405,787) or Kudo (US 6,420,261) in view of Seki (US 6,624,071) and Applicant's Disclosure. Applicant respectfully traverses these rejections for at least the following reasons.

Independent claims 1 and 2, as amended, recite a method for manufacturing a semiconductor device including, in part, "forming a barrier layer by selectively discharging a composition to at least a side surface of the opening." In direct contrast to Applicant's claimed invention, none of Kurimoto, Kudo, Seki, and/or Applicant's Disclosure, whether taken singly or combined, teach or suggest the combination of features including "forming a barrier layer by selectively discharging a composition to at least a side surface of the opening," as required by amended independent claims 1 and 2. Moreover, Applicant respectfully asserts that none of Kurimoto, Kudo, Seki, and/or Applicant's Disclosure, whether taken singly or combined, teach or suggest formation of a barrier layer to prevent disconnection due to a step occurring according to an angle of a side surface in the opening, as disclosed at paragraph [0069] of the instant application.

Independent claims 3-6, as amended, recite a method for manufacturing a semiconductor device including, in part, "adding an inert element to the first insulating film." In direct contrast to Applicant's claimed invention, none of Kurimoto, Kudo, Seki, and/or Applicant's Disclosure, whether taken singly or combined, teach or suggest the combination of features including "adding an inert element to the first insulating film," as required by amended independent claims 3-6. Moreover, Applicant respectfully asserts that none of Kurimoto, Kudo, Seki, and/or Applicant's Disclosure, whether taken singly or combined, teach or suggest adding an element to modify the surface of the insulating film to prevent

solution constituents from entering the insulating film or reacting when a step using liquid, i.e., a wet step, is subsequently performed. In addition, Applicant respectfully asserts that adding an inert element to the insulating film prevents the release of moisture or a gas from the insulating film when a heat treatment is subsequently performed. Furthermore, adding an inert element to the insulating film prevents release of moisture or a gas from the insulating film due to a change over time, which results in enhancing reliability of a semiconductor device. See paragraph [0060] of the present application.

For at least the reasons presented above, Applicant respectfully asserts that the Final Office Action fails to establish a *prima facie* case of obviousness with regard to amended independent claims 1-6, and hence dependent claims 7-100. Thus, Applicant respectfully requests that the rejection under 35 U.S.C. §103(a) be withdrawn.

If a conference would expedite prosecution of the instant application, the Examiner is hereby invited to telephone Applicant's undersigned representative to arrange such a conference.

Respectfully submitted,

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